heeting u/PSNH Neeting 12/12/06

HB 1673

- ➤ Recognized suspect nature of 2003 stack test data
- > Acknowledged the need for current and accurate mercury data
- > Required calculation of baseline using current stack test results and current fuel data
- > Realized and addressed the numerous emissions reduction tests and trials that would be ongoing at Merrimack Station (i.e. DOE testing, NHCPA coal blend testing), all of which require the units to burn non-traditional fuels.
- > Confirmed that baseline should be calculated using traditional fuels, excluding trial or test coals

Requirements to Obtain Current and Accurate Mercury Data

Stack Testing Requirements

- > Conduct 4 tests (at a minimum) on MK1, MK2, and SR4 (or SR6)
- Emissions reduction tests/trials will be interrupted to complete required stack tests
- > Use best available / most appropriate stack test method
- > Produce current and accurate data
- > Confirm data repeatability

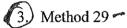
Fuel Sampling Requirements

- > 12 month sampling program
- > Representative monthly sample of coal used traditionally, not to include trial or test coal blends
- ➤ At least 4 samples shall correspond with stack tests conducted
- Provides current coal data to avoid relying on 2002-2003 data for use with 2006 stack test data

IMPLEMENTATION

Stack Testing Options

- 1. Ontario Hydro Method
 - > Provides speciated data
 - > Conducted previously at MK and SR
 - > More complicated and expensive than other test methods
 - > Accuracy suspect
- 2. Sorbent Trap Method (i.e., Appendix K, Method 324)
 - > Recommended for use in calculating baseline emissions by ADA-ES
 - > Conducted previously at MK and SR
 - > Widely used and accepted for use by utilities
 - > Less complicated and less expensive than OHM



- > Established method for use by MWCs
- > Limited use by utilities
- > Less complicated and less expensive than OHM
- > More expensive and complicated than Sorbent Trap Method

Fuel Sampling Options

- 1. Fuel Shipment Sampling Analysis
 - Consistent with analysis conducted to satisfy fuel sampling program requirements contained in HB 284
 - Most extensive, accurate, and consistent
 - > Conducted using required ASTM methods
 - > Analytical procedures audited
 - > Commercial accuracy maintained
 - > Eliminates data gaps
 - > Significant amount of historical data exists for comparison and validation
- 2. On-Site Fuel Sampling Analysis
 - > Creates data gaps when test blends and trials are on-going
 - > Representative sample cannot be substantiated
 - > Limited ability to conduct comparison and validation of data
 - > Would require interruption of trial and test programs, resulting in increased emissions and decreased evaluation of potential fuels for future use